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PUC DOCKET NO. 48785
SOAH DOCKET NO. 473-19-1265

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PUBLIC UTILITY COMMISSION
BEFORE THE FILING CLERK

JOINT APPLICATION OF ONCOR §
ELECTRIC DELIVERY COMPANY §
LLC AND AEP TEXAS INC. TO §
AMEND THEIR CERTIFICATES OF §
CONVENIENCE AND NECESSITY FOR § PUBLIC UTILITY COMMISSION
A DOUBLE CIRCUIT 345-KV §
TRANSMISSION LINE IN PECOS, §
REEVES, AND WARD COUNTIES, §
TEXAS (SAND LAKE TO SOLSTICE) § OF TEXAS

**MOTION TO REOPEN THE RECORD AND ADMIT EVIDENCE
REGARDING THE COST OF PROPOSED LINK B2 MODIFICATION**

TO THE HONORABLE PUBLIC UTILITY COMMISSION OF TEXAS:

COME NOW Oncor Electric Delivery Company LLC (“Oncor”) and AEP Texas Inc. (“AEP Texas”) (together, “Applicants”) and file this Motion to Reopen the Record and Admit Evidence Regarding the Cost of Link B2 Modification (“Motion”), respectfully showing as follows:

The evidentiary record in this docket closed on March 19, 2019.¹ The proposal for decision (“PFD”) issued in this docket on April 10, 2019, recommends approval of Plains Pipeline’s² modification to Link B2 as part of the PFD’s recommendation to approve route 320. The PFD assumes there will be no cost difference between Link B2 as proposed in the CCN application and Link B2 as modified to incorporate Plains Pipeline’s request to parallel the western part of a pipeline easement on its property rather than its western property boundary.³

On April 23, 2019, Applicants filed exceptions to the PFD on this issue.⁴ Commission Staff also filed exceptions to the PFD.⁵ Staff stated that it “excepts to the ALJs’ assumptions about

¹ See PFD at 44, Finding of Fact No. 31 (Apr. 10, 2019).

² The Motion and Affidavit refer to Plains Marketing, L.P. and Plains Pipeline, L.P. collectively as “Plains Pipeline.”

³ See, e.g., PFD at 35 (Apr. 10, 2019).

⁴ See Applicants’ Exceptions at 1 (Apr. 23, 2019).

⁵ See Commission Staff’s Exceptions at 6 (Apr. 23, 2019).

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the costs of Plains Pipeline's proposed modifications, and asks that the expected cost be included in the record for consideration by the Commission."⁶

Because the PFD explicitly analyzed and recommended adoption of Plains Pipeline's proposed Link B2 modification, and Staff specifically requested cost information for the record, Applicants move to reopen the record for the limited purpose of admitting into evidence the affidavit of Wilson P. Peppard ("Affidavit") attached hereto as Oncor-AEPTX Exhibit No. 16. The Affidavit addresses the estimated cost associated with this proposed modification to Link B2 as detailed in the PFD and requested by Staff.

⁶ *See id.* The PFD noted that "[t]he ALJs assume that [the Plains Pipeline] modification would not increase the cost to Link B2 and Route 320 because it is essentially using the hypotenuse of a right triangle as its length, rather than the two legs of the right triangle." *See* PFD at 35.

Respectfully submitted,

By: Winston Skinner w/permission
by A. Yates

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CERTIFICATE OF SERVICE

It is hereby certified that a copy of the foregoing has been hand-delivered or sent via courier service, email, fax, overnight delivery, or first class United States mail, postage prepaid, to all parties of record in this proceeding, on the 6th day of May, 2019.

*Kerry McGrath w/permission
by A. Yates*

**PUC DOCKET NO. 48785
SOAH DOCKET NO. 473-19-1265**

JOINT APPLICATION OF ONCOR ELECTRIC DELIVERY COMPANY LLC AND AEP TEXAS INC. TO AMEND THEIR CERTIFICATES OF CONVENIENCE AND NECESSITY FOR A DOUBLE CIRCUIT 345-KV TRANSMISSION LINE IN PECOS, REEVES, AND WARD COUNTIES, TEXAS (SAND LAKE TO SOLSTICE)	§ § § § § § § § §	BEFORE THE PUBLIC UTILITY COMMISSION OF TEXAS
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**AFFIDAVIT OF WILSON P. PEPPARD
REGARDING THE ESTIMATED COST OF PROPOSED LINK B2 MODIFICATION**

STATE OF TEXAS §

COUNTY OF TARRANT §

BEFORE ME, the undersigned authority, personally appeared Wilson P. Peppard, known to me to be the person whose name is subscribed below, who upon oath deposed and stated as follows:

1. My name is Wilson P. Peppard. My business address is 115 West 7th Street, Fort Worth, Texas 76102. I am over eighteen (18) years of age and have never been convicted of a felony. I have personal knowledge of the facts contained herein, and they are true and correct to the best of my knowledge.
2. I am currently employed by Oncor Electric Delivery Company LLC ("Oncor") as a Professional Engineer focused on the design and construction of transmission lines. I previously testified in this proceeding on behalf of Oncor and AEP Texas Inc. ("AEP Texas"). I am authorized to make this Affidavit on behalf of Oncor and AEP Texas.
3. Plains Pipeline proposed—and the Administrative Law Judges ("ALJs") recommended in their Proposal for Decision ("PFD") that the Public Utility Commission of Texas

AFFIDAVIT OF WILSON P. PEPPARD – PAGE 1 OF 3


ONCOR/AEPTX EX. 16

(“Commission”) adopt—a modification to Link B2 on tract 492, a property owned by Plains Pipeline.

4. As originally proposed in the CCN Application, from the node of Links A, B1, and B2 located on tract 492 owned by Plains Pipeline, Link B2 runs westward to the western boundary of Plains Pipeline’s property, crossing a natural gas pipeline, and thereafter makes a 90-degree turn south to parallel that tract’s western boundary until it exits that tract.
5. The proposed Plains Pipeline modification to Link B2 would parallel the western side of a natural gas pipeline easement wholly within Plains Pipeline’s tract 492. More specifically, the Link B2 modification would require two approximately 45-degree turns, the first departing from original Link B2 to begin paralleling the west side of the existing natural gas pipeline right-of-way in a southwesterly direction across Plains Pipeline’s property, and the second to re-connect with original Link B2 near the southern corner of tract 492. The recommended Link B2 modification therefore avoids the 90-degree turn near the western corner of tract 492 that otherwise exists on the unmodified Link B2 as originally proposed.¹
6. For routes using modified Link B2 as requested by Plains Pipeline and recommended in the PFD, route length would decrease approximately one-tenth of a mile; one additional turning structure location would be added; and estimated cost would increase by approximately \$250,000.

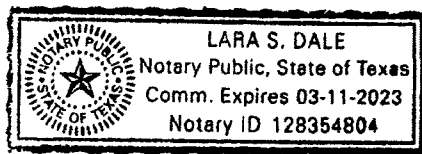
¹ See PFD at 35 (Apr. 10, 2019); Plains Pipeline Response to Order No. 11, at 2, Figure 1 (Mar. 19, 2019).

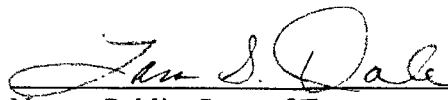
FURTHER AFFIANT SAYETH NOT.



Wilson P. Peppard

SUBSCRIBED AND SWORN TO before me on this the 6th day of May, 2019, to certify which witness my official hand and seal of office.





Notary Public, State of Texas